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Attorneys for Defendant
FUJIAN JINHUA INTEGRATED CIRCUIT CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

UNITED MICROELECTRONICS
CORPORATION et al.,

Defendants.

CASE NO.: 3:18-cr-00465-MMC

**JOINT STIPULATION SETTING
DEADLINE FOR THE UNITED
STATES TO MAKE LOCAL RULE 16-
1(C) SUPPLEMENTAL
DISCLOSURES; [PROPOSED]
ORDER**

Judge: The Honorable Maxine M. Chesney
Trial Date: February 14, 2022

Defendant Fujian Jinhua Integrated Circuit Co., Ltd. (“Jinhua”) and the United States (collectively, the “Parties”), by and through their undersigned counsel, stipulate to the following and respectfully request the Court to enter the proposed order below setting the date for the United States’ Supplemental Disclosures pursuant to Local Criminal Rule 16-1(c):

WHEREAS, pursuant to Local Rule 16-1, “in order to expedite the trial of the case,” the government shall make supplemental disclosures about (1) the existence of electronic surveillance; and the government’s intent to use or introduce (2) testimony from informants; (3) evidence of other crimes, wrongs or bad acts under Fed. R. Evid. 404(b); and (4) alleged co-conspirators’ statements, pursuant to Fed. R. Evid. 801(d)(2)(E), on a schedule established by the parties or by the assigned Court (*see* Crim. L.R. 16-1(b), (c));

WHEREAS, the current case scheduling order sets no date for the United States to make its Local Rule 16-1(c) supplemental disclosures (Dkts. 160, 161);

WHEREAS, the parties have agreed that the United States will provide its Local Rule 16-1(c) supplemental disclosures on November 1, 2021;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Jinhua and the United States, that the deadline for the United States to make its Local Rule 16-1(c) supplemental disclosures is November 1, 2021.

SO STIPULATED AND AGREED.

Dated: May 21, 2021

Respectfully Submitted,

/s/ Matthew E. Sloan
JACK P. DICANIO
MATTHEW E. SLOAN
Attorney for Defendant
Fujian Jinhua Integrated Circuit Co. Ltd.

STEPHANIE M. HINDS
Acting United States Attorney

In compliance with Local Civil Rule 5-1(i)(3), I, Matthew E. Sloan, attest that Laura Vartain Horn has concurred in this filing.

/s/ Laura Vartain Horn
LAURA VARTAIN HORN
Assistant United States Attorneys
NICHOLAS O. HUNTER
STEVEN MARZEN
Trial Attorneys, National Security Division

[PROPOSED] ORDER

Good cause appearing, as set forth in the parties' Joint Stipulation, the Court hereby sets the following date for the United States' Local Rule 16-1(c) Supplemental Disclosures:

Event	Date
United States' production of Criminal Local Rule 16-1(c) supplemental disclosures	November 1, 2021

IT IS SO ORDERED.

Dated:

MAXINE M. CHESNEY
United States Senior District Judge